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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 vs.  
16 JAMIE COLLAZO MUNOZ  
17 Defendant

18 CASE NO. 3:21-cr-00010-MMD-CLB

19 **Stipulation for Extension of Time to File Fed.  
20 R. Crim. Pro. 29(c) Motion**

21 It is hereby stipulated and agreed, by and between Jason Frierson, United States Attorney  
22 for the District of Nevada, and Andolyn Johnson and Andrew Keenan, Assistant United States  
23 Attorneys, and Jacqueline Tirinnanzi, Esq. and Kathleen Bliss, Esq., counsel for Jamie Collazo  
24 Munoz, that good cause exists for the Court to extend the deadline for defense counsel to file its  
25 Fed. R. Crim. P. 29(c) motion for judgment of acquittal by 21 days to October 21, 2022.

26 A guilty verdict was returned on September 16, 2022. ECF No. 153. Under Rule 29(c)(1),  
27 a motion must be filed within 14 days of a guilty verdict, resulting in the current deadline being  
28 no later than September 30, 2022. Defense counsel initially requested various trial transcripts at  
29 an expedited rate from the court reporter who was present for the duration of the trial. However,  
30 due to the volume of transcripts requested within a short timeframe and the court reporter being  
31 occupied with another trial beginning the week of September 26, 2022, production of the  
32 requested transcripts before September 30, 2022 is an overly burdensome and impracticable

request. The government has no objection to the brief continuance to allow for production of the trial transcripts. Denial of this request for an extension of time for the purpose of accessing trial transcripts would deny counsel for Mr. Munoz the ability to effectively and accurately prepare his Rule 29(c) motion, which is critical to preservation of appellate issues.

Therefore, the parties respectfully stipulate, subject to the Court's approval:

The due date for defendant's motion for judgment of acquittal under Rule 29 should be extended to October 21, 2022;

The government's response should be filed no later than November 16, 2022; and

The defendant's reply should be filed on or before November 23, 2022.

/s/ Andolyn Johnson  
Andolyn Johnson  
Assistant U.S. Attorney

/s/Jacqueline Tirinnanzi  
Jacqueline Tirinnanzi  
Counsel for Jamie Collazo Munoz

Dated this 26<sup>th</sup> day of September 26, 2022.

**HONORABLE MIRANDA M. DU**  
**CHIEF UNITED STATES DISTRICT JUDGE**

**DATED:** September 27, 2022